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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIEL PAZ-HERRERA,

Defendant.

2:15-mj-00570-CWH

STIPULATION TO CONTINUE
TRIAL (1st REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel for the United States of America, and Jay L. Siegel, Esq., counsel for defendant Daniel Paz-Herrera that the trial date currently set for Wednesday, November 18, 2015 at 9:00 a.m., be vacated and continued for forty-five (45) days or to a date and time convenient to the Court.

This stipulation is entered into for the following reasons:

1. The parties are in the process of negotiating a resolution of the case that would obviate the need for trial. The parties need additional time to do so.

2. The Defendant is not in custody and agrees to the continuance.

3. Denial of this request for a trial continuance would prejudice both the Defendants and the Government and unnecessarily consume this Court's valuable resources, taking into account the exercise of due diligence.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this stipulation, is excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and § 3161(h)(8)(A), considering the factors under 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

6. There have been no previous requests for a continuance of the trial in this case.

DATED this 16th day of November, 2015.

Respectfully submitted,

DANIEL G. BOGDEN
United States Attorney

/s/ Jay L. Siegel
By: _____

Jay L. Siegel
Counsel for Defendant
DANIEL PAZ-HERRERA

/s/ Nadia Ahmed
By: _____
Nadia Ahmed
Special Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

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ORDER CONTINUING TRIAL

Based on the pending stipulation of counsel, and good cause appearing therefore, the court hereby finds that:

IT IS HEREBY ORDERED that the ~~deadline to continue the~~ trial, currently scheduled for Wednesday, November 18, 2015, at the hour of 9:00 a.m., is continued to January 27, 2016, at 9:00 a.m.

DATED November 16, 2015

UNITED STATES MAGISTRATE JUDGE